

## REMARKS

In the Official Action mailed on **August 2, 2004**, the Examiner reviewed claims 1-36. Claims 1-15 were rejected under 35 U.S.C. §102(b) as being anticipated by Srinivasan (USPN 5,799,309, hereinafter “Srinivasan”). Claim 16 was rejected under 35 U.S.C. §103(a) as being unpatentable over Srinivasan. Claims 17-36 were rejected under 35 U.S.C. §102(b) as being anticipated by Srinivasan.

### Rejections under 35 U.S.C. §102(b) and 35 U.S.C. §103(a)

Claims 1-15 and 17-36 were rejected under 35 U.S.C. §102(b) as being anticipated by Srinivasan. Furthermore, claim 16 was rejected under 35 U.S.C. §103(a) as being unpatentable over Srinivasan.

Applicant respectfully points out that Srinivasan teaches away from the present invention. Specifically, Srinivasan teaches that “*the user must explicitly specify the paths (starting from the top-level objects) leading to those objects*” (Srinivasan, col. 7, lines 65-67). Furthermore, Srinivasan teaches that “*If a prefetch path is not provided, then only the base attributes of the top-level object are initialized*” (Srinivasan, col. 7, lines 62-64).

In contrast, the present invention is directed towards automatically generating a query to retrieve target objects and their nested objects that are pointed to by source objects (see page 3, lines 1-7, page 3, lines 21-31, page 9, lines 6-10, page 10, lines 3-7). In other words, the present invention does not require the user to explicitly specify the prefetch paths for the target objects and nested objects; instead, **the present invention automatically generates the prefetch paths.**

Note that the process of automatically generating a query to retrieve target objects and their nested objects is not obvious because it involves the complex operations described in Figure 3B, Figures 4-7, and page 9, line 28 through page

16, line 20. Specifically, automatically generating the query can involve “*building from the mapping metadata a target expression tree defined by the many-to-many relationships*” (see page 15, lines 10-14). Furthermore, automatically generating the query can also involve appending an expression tree to the upper level expression tree and then passing on the combined expression tree to the next level (see page 16, lines 16-20).

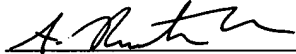
Accordingly, Applicant has amended claims 1, 10, 17, 24, and 31-36 to further specify that the system does not receive an explicit list of prefetch paths from the user. Furthermore, Applicant has canceled dependent claims 16 and 30 without prejudice.

Hence, Applicant respectfully submits that independent claims 1, 10, 17, 24 and 31-36 as presently amended are in condition for allowance. Applicant also submits that claims 2-9, which depend upon claim 1, claims 11-15, which depend upon claim 10, claims 18-23, which depend upon claim 17, and claims 25-29, which depend upon claim 24, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

**CONCLUSION**

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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